

The Honorable Lauren King  
The Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; and THE THOUGHT & EXPRESSION CO., INC., a Virginia corporation,

Plaintiffs,

V.

AMANDEEP SINGH, an individual; and  
BHUSHAN KUMAR, an individual; and DOES  
1-10.

## Defendants.

No. 2:24-cv-01464-LK-BAT

**DECLARATION OF ROBERT  
GARRETT IN SUPPORT OF  
PLAINTIFFS' *EX PARTE* MOTION  
FOR ALTERNATIVE SERVICE**

I, Robert Garrett, declare and state as follows:

1. I am over the age of 18 and competent to testify to the matters stated herein. I have been employed by Amazon.com, Inc. (“Amazon”), or its subsidiaries, since June 24, 2019. I have personal knowledge of the facts in this declaration or have acquired this knowledge through my review of records kept in the regular course of business. The statements made below are true to the best of my knowledge and belief. I make them in support of Plaintiffs’ *Ex Parte* Motion for Alternative Service.

2. My current role is Principal Risk Manager for the Amazon Counterfeit Crimes Unit, where I am responsible for investigating bad actors suspected of selling counterfeit

1 products in Amazon's stores. The Amazon Counterfeit Crimes Unit is a global team dedicated to  
 2 pursuing bad actors and holding them accountable to the fullest extent of the law, including by  
 3 referring them to law enforcement and by pursuing civil lawsuits.

4       3. Amazon offers third-party sellers and brand owners the ability to sell products in  
 5 the Amazon.com store (the "Amazon Store") by registering Amazon selling accounts. Amazon  
 6 uses advanced technology and expert human reviewers to verify the identities of potential sellers.  
 7 When prospective sellers apply to sell in Amazon's stores, they are required to provide a form of  
 8 government-issued photo ID, along with other information about their business. Amazon  
 9 employs advanced identity detection methods such as document forgery detection, image and  
 10 video verification, and other technologies to quickly confirm the authenticity of government-  
 11 issued IDs and whether such IDs match the individual applying to sell in Amazon's stores. In  
 12 addition to verifying IDs, Amazon's systems analyze numerous data points, including behavior  
 13 signals and connections to previously detected bad actors, to detect and prevent risks. Despite  
 14 these efforts, a small number of bad actors attempt to circumvent Amazon's systems by  
 15 submitting fraudulent and deliberately false information to Amazon, as Defendants did here.

16       4. I have analyzed the data provided to Amazon by the persons responsible for the  
 17 selling accounts that sold counterfeit Thought Catalogue books, listed below (the "Selling  
 18 Accounts"). The following email addresses were provided to Amazon when the Selling Accounts  
 19 were registered:

<u>Selling Account</u>	<u>Email Address</u>
Augstin Retail	retailagustin@gmail.com
Borning	borningllc.panorama@gmail.com
Smarktabs	smarktabs.panorama@gmail.com
Golden Store	goldenstore.panorama@gmail.com

26       5. The persons responsible for the Selling Accounts, like all sellers in the Amazon  
 27 Store, registered these email addresses in order to create their Selling Accounts, access

1 Amazon's Seller Central,<sup>1</sup> and conduct business through their Selling Accounts. These email  
2 addresses are also the primary means of communication from Amazon and the operators of the  
3 Selling Accounts, and were used by the operators of the Selling Accounts to log into the Selling  
4 Accounts.

5 6. According to Amazon's records, those responsible for the Augstin Retail Selling  
6 Account last accessed Seller Central using their registered email address listed above on June 5,  
7 2023.

8 7. According to Amazon's records, those responsible for the Borning Selling  
9 Account last accessed Seller Central using their registered email address listed above on June 1,  
10 2023.

11 8. According to Amazon's records, those responsible for the Smarktabs Selling  
12 Account last accessed Seller Central using their registered email address listed above on June 5,  
13 2023.

14 9. According to Amazon's records, those responsible for the Golden Store Selling  
15 Account last accessed Seller Central using their registered email address listed above on June 7,  
16 2023.

17 10. In order to facilitate further investigation into the identities and whereabouts of  
18 the bad actors responsible for the Selling Accounts, I provided Amazon's counsel at Davis  
19 Wright Tremaine with the identification, contact, and banking information that was provided to  
20 Amazon in connection with registration of the Selling Accounts, as well as information reflecting  
21 the IP networks used to log in to the Selling Accounts.

22  
23 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
24 knowledge.

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27 <sup>1</sup> "Seller Central" is the online portal that sellers use to access their selling accounts, list products for sale, manage sales and inventory, track payments and returns, and manage advertising programs, among other things.

1 EXECUTED this 24<sup>th</sup> day of October, 2024, in Arlington, Virginia.  
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A handwritten signature in black ink, appearing to read "ROBERT GARRETT", is written over a horizontal line. The signature is fluid and cursive, with the name enclosed in a thin rectangular outline.

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